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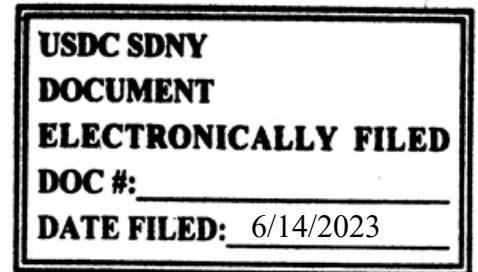
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June 13, 2023

VIA ECF

Hon. Katharine H. Parker
United States Magistrate Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312



Re: Rene v. 31 East 21 Express Inc. et al.
Case No.: 21-cv-7435 (JGK) (KHP)

Dear Judge Parker:

We represent Plaintiff in this action. We write to request that the deadline for Plaintiff to file a motion to compel in this case be extended by one week, from June 16, 2023 until June 23, 2023 and the deadline to oppose from June 30, 2023 to July 7, 2023. This is the first request of this kind and answering Defendants consent.

The reason for this request is that Plaintiff's counsel is involved in two day-long mediations this week and needs additional time to prepare the motion. The proposed extension would not delay this matter because the response to the motion to compel will be due more than two weeks prior to the July 24, 2023 status conference and therefore the case will not be delayed.

Thank you for your attention to the above.

Respectfully Submitted,

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Michael Taubenfeld

APPLICATION GRANTED

Hon. Katharine H. Parker, U.S.M.J.

6/14/2023